

WILMINGTON SAVINGS FUND SOCIETY	§	
FSB, DBA CHRISTIANA TRUST,	§	
NOT INDIVIDUALLY BUT AS TRUSTEE	§	
FOR PRETIUM MORTGAGE ACQUISITION	§	
TRUST	§	IN THE UNITED STATES DISTRICT COURT
		FOR THE SOUTHERN DISTRICT OTEXAS
PLAINTIFFS	§	
	§	
V.	§	
	§	
LEEROY M. MYERS, BARBARA MYERS	§	
DEFENDANT	§	

AFFIDAVIT IN SUPPORT OF MOTION FOR SUBSTITUTE SERVICE

The following came to my hand on the day of January 20, 2022 at 11:12 o'clock A.M.,

SUMMONS AND COMPLAINT to be served on Leeroy Myers at 12215 Carola Forest Drive Houston, TX 77044. Below is a list of the attempts made in order to render service.

1/20/2022 at 7:55 PM I made the very first attempt to serve the defendant and there was no answer at the door. I tried knocking on the door of the neighbors (both to the left and right) and did not get an answer.

1/22/22 at 8:32am No answer. Home is not vacant. There are things outside of the home that indicate that someone lives here.

1/25/22 at 1:35pm No answer. There aren't any vehicles parked in the driveway and have not been during each attempt. I left a notice on the door with my contact information.

1/26/22 at 11:28am I received a call from Mr. LeeRoy Myers. He said that he and Barbara were not in town, but he did receive my notice. I asked him if there were a better time to meet and he said that he would contact his attorney, Mr. Joffrey, to see if he will accept for him. He called me from phone number 7133031777.

2/15/22 contact was made with the defendant's attorney (Ira Joffrey) and he does not wish to accept on their behalf.

2/22/2022 at 4:49 pm. No Answer. No vehicles in the driveway. After not being able to reach anyone today, I called the defendants phone number to see if he'd be willing to arrange a meeting with me. He said currently they are in Florida and will not return until Friday. He said he will contact me on Friday to schedule service.


3/1/22 10:10am - No answer at the home. I called the defendant and he said that his attorney sent a Summons to the opposing party (The plaintiff) He said that his attorney instructed him to not accept our service until the opposing party responds to the Summons they sent. He was advised not to accept.

Upon investigation, I determined that 12215 Carola Forest Drive Houston, TX 77044 is the usual place residence for the defendant Leeroy Myers, and he is avoiding service of the SUMMONS AND COMPLAINT.

I believe the defendant Leeroy Myers can receive and will be given notice of these proceedings by delivering to anyone over the age of sixteen(16) at the defendant's usual place of abode or by attaching the above listed documents to the front entrance or front gate of the defendant's usual place of abode (12215 Carola Forest Drive Houston, TX 77044) .

I am a person over eighteen (18) years of age and I am competent to make this affidavit. I am a resident of the State of Texas. I am familiar with the Texas Rules of Civil Procedure as they apply to service of Process. I am not a party to this suit nor related or affiliated with any herein, and have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I have personal knowledge of the facts stated herein and they are true and correct."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT EXECUTED IN HARRIS COUNTY, STATE OF TEXAS, ON THE 9th DAY OF MARCH 2022.



Christina Edwards
Authorized Person PSC: 13296
Exp: 10/31/2023 Harris County Texas